

Specification Section 971

Subarticle 971-3

ORIGINATION

Date: 5-26-26

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COMMENTARY

To allow performance-based requirements instead of strict compositional ones which will provide greater formulation flexibility for vendors, clarify physical requirements, and align requirements with current best practices overall.

INDUSTRY COMMENTS AND RESPONSES

(Please note all comments and responses are verbatim as received. The Specifications Office does not alter typos or grammar.)

BLACK = Comment **BLUE** = Specifications Response **GREEN** = Change Made to Specification

Name: Eric Greyson

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Date: 7/22/26

COMMENT: Overall I think this is a great update and will serve the motorists, the state, the contractors and the manufacturers well. Below are some detailed comments and questions that I hope can make the updated document even stronger.

In section 971-3.2 it is good that you restrict selection to paints applied at one set thickness so you are comparing apples to apples. I would strongly recommend only considering paints applied only with type 1 beads with RI<1.55. Otherwise you could have an inferior paint product pass based on using high index beads for example. This only makes sense if the paint is only approved with those premium beads.

In the same section I would recommend extending the time window for an approved product to say 8-10 years. Rationale being that a product applied in 2026 likely won't have 1 year data posted and approved until 2028 meaning that a given product would only be good for four years.

In table 971-6B, I want to clarify what plus minus five percent means on pigment by weight and solids by weight. For example if the test sample was 78 percent solids by weight would this mean 73-83% solids pass or 74.1-81.9? If there is a way to make this more clear it would be good. Also, I think narrower tolerances would be advisable - e.g. absolute $\pm 2\%$ (e.g. 76-80%). $\pm 2\%$ is a very reasonable tolerance for any manufacturer and is line with many other specifications. Using a wider tolerance almost asks manufacturers in a low bid world to intentionally provide a cheaper paint than approved.

In 971-4.2 I have the same comments about extending time to 8-10 years and about limiting to only paints applied with all beads RI<1.55. I would leave bead size up to manufacturer discretion as a 20 mil and 30 mil paint might have different ideal bead packages and even two different paints of the same thickness may have different ideal bead packages.

I have the same comments about table 971-8A as I made about table 6A.

To conclude, I fully support the direction of these specification updates. I have made a few suggestions that I hope can make the new specification even better. Thanks!

RESPONSE:

Thank you for the detailed review and feedback. We agree with the recommendation to limit approval to paints evaluated with Type I beads meeting a specified refractive index, as supported by AASHTO M 247 and FM 5-523, and support extending the approval window as suggested.

Regarding Table 971-6B, our original intent for the $\pm 5\%$ tolerance was that it be applied relative to the measured value. Following your example, a measured solids content of 78% would correspond to an acceptable range of 74.1–81.9%. We agree that adopting an absolute $\pm 2\%$ tolerance would improve clarity and better ensure consistency with approved product formulations.

ACTION TAKEN:

Further revision made to 971-3.2, Table 971-6B, 971-4.2 and Table 971-8B.